

Jesse J. Maddox, Bar No. 219091  
jmaddox@lcwlegal.com  
David A. Urban, Bar No. 159633  
durban@lcwlegal.com  
Olga Y. Bryan, Bar No. 298969  
obryan@lcwlegal.com  
Morgan Johnson, Bar No. 345620  
mjohnson@lcwlegal.com  
LIEBERT CASSIDY WHITMORE  
A Professional Law Corporation  
5250 North Palm Ave, Suite 310  
Fresno, California 93704  
Telephone: 559.256.7800  
Facsimile: 559.449.4535

Attorneys for Defendants STEVE WATKIN in his official capacity  
as Interim President, Bakersfield College; et al.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA - BAKERSFIELD

DAYMON JOHNSON,

Plaintiff,

v.

STEVE WATKIN, in his official  
capacity as Interim President, Bakersfield  
College; et al.,

Respondent.

Case No.: 1:23-cv-00848 KES-CDB

Complaint Filed: June 1, 2023  
FAC Filed: July 6, 2023

**NOTICE OF SUPPLEMENTAL AUTHORITY**

Pursuant to Local Rule 230(m)(2), Defendants Steve Watkin, Richard McCrow, Thomas Burke, Romeo Agbalog, John S. Corkins, Kay S. Meek, Kyle Carter, Christina Scrivner, Nan Gomez Heitzeberg, and Yovani Jimenez (the “District Defendants”) respectfully file this Notice of Supplemental Authority to bring the Court’s attention to the order issued by the United States District Court for the Southern District of Indiana in *Carr v. Trs. of Purdue Univ.*, No. 1:24-cv-00772-SEB-MJD, 2024 U.S. Dist. LEXIS 144534 (S.D. Ind. Aug. 14, 2024) (dismissing Plaintiff faculty members’ pre-enforcement § 1983 First Amendment challenge to a state law tying tenure and promotion decisions to an evaluation of whether a faculty member’s pedagogy aligns with principles of free inquiry, free expression, and intellectual diversity and denying Plaintiffs’ preliminary injunction motion because Plaintiffs’ premature speculation and conjecture as to how

the challenged law might be interpreted and applied was insufficient to establish Article III standing).

Dated: August 23, 2024

Respectfully submitted,

LIEBERT CASSIDY WHITMORE

By: /s/ MORGAN JOHNSON

Jesse J. Maddox  
David A. Urban  
Olga Y. Bryan  
Morgan Johnson  
Attorneys for Defendants STEVE  
WATKIN in his official capacity as  
Interim President, Bakersfield College;  
et al.

Liebert Cassidy Whitmore  
A Professional Law Corporation  
5250 North Palm Ave, Suite 310  
Fresno, California 93704